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*Attorneys for Defendants Edward Christopher  
Sheeran, Atlantic Recording Corporation and  
Sony/ATV Music Publishing LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

KATHRYN TOWNSEND GRIFFIN, HELEN  
MCDONALD, and THE ESTATE OF CHERRIGALE  
TOWNSEND,

*Plaintiffs,*

-against-

EDWARD CHRISTOPHER SHEERAN, p/k/a ED  
SHEERAN, ATLANTIC RECORDING  
CORPORATION, d/b/a ATLANTIC RECORDS,  
SONY/ATV MUSIC PUBLISHING, LLC, and  
WARNER MUSIC GROUP CORPORATION, d/b/a  
ASYLUM RECORDS

*Defendants.*

ECF CASE

17-cv-5221 (LLS)

**NOTICE OF MOTION –  
DEFENDANTS’ SECOND  
MOTION *IN LIMINE***

**PLEASE TAKE NOTICE**, that upon the accompanying Memorandum of Law, the Declaration of Donald S. Zakarin, sworn to July 8, 2020 and the Exhibits annexed thereto, and all prior proceedings had herein, Defendants Edward Christopher Sheeran (“Sheeran”), Atlantic Recording Corporation (“Atlantic”) and Sony/ATV Music Publishing LLC (“SATV,” together with Atlantic and Sheeran, the “Defendants” and each a “Defendant”) will move this Court, before the Honorable Louis L. Stanton at the Daniel Patrick Moynihan United States Courthouse, Courtroom 21C, 500 Pearl Street, New York, New York, 10007, on a date and time to be determined by the Court, for an Order, pursuant

to Fed. R. Evid. 702 and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993), (i) excluding the expert report of Dr. Alexander Stewart (“Dr. Stewart”) and excluding Dr. Stewart as a trial witness; or (ii) in the alternative, in the event the Court does not exclude Dr. Stewart’s expert report in its entirety and exclude Dr. Stewart as a trial witness, limiting the admissibility of the Dr. Stewart expert report and the testimony of Dr. Stewart for the reasons and to the full extent set forth in Section III of the accompanying Memorandum of Law.

The reasons and grounds for this motion are more fully described in the accompanying papers.

Oral argument, if any shall be directed by the Court, and shall be held on a date and at a time designated by the Court.

Dated: New York, New York  
July 8, 2020

PRYOR CASHMAN LLP

By: /s/ Donald S. Zakarin

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